

**U.S. District Court
District of Columbia (Washington, DC)
CIVIL DOCKET FOR CASE #: 1:19-cv-02781-RDM**

PROTECT DEMOCRACY PROJECT, INC.
Assigned to: Judge Randolph D. Moss
Cause: 05:552 Freedom of Information Act

Date Filed: 09/17/2019
Jury Demand: None
Nature of Suit: 895 Freedom of Information Act
Jurisdiction: U.S. Government Defendant

Plaintiff

PROTECT DEMOCRACY PROJECT, INC.

represented by **Michael Patrick Abate**
KAPLAN & PARTNERS LLP
710 W. Main St.
4th Floor
Louisville, KY 40202
(502) 540-8280
Email: mabate@kplouisville.com
ATTORNEY TO BE NOTICED

Plaintiff

NEGAR MORTAZAVI

represented by **Michael Patrick Abate**
(See above for address)
ATTORNEY TO BE NOTICED

Plaintiff

NARGES BAJOGHLI

represented by **Michael Patrick Abate**
(See above for address)
ATTORNEY TO BE NOTICED

Plaintiff

MOHAMMAD ALI SHABANI

represented by **Michael Patrick Abate**
(See above for address)
ATTORNEY TO BE NOTICED

Plaintiff

ESFANDYAR BATMANGHELIDJ

represented by **Michael Patrick Abate**
(See above for address)
ATTORNEY TO BE NOTICED

Plaintiff

TRITA PARSI

represented by **Michael Patrick Abate**
(See above for address)
ATTORNEY TO BE NOTICED

V.

Defendant

U.S. DEPARTMENT OF STATE

represented by **Diana Viggiano Valdivia**
U.S. ATTORNEY'S OFFICE FOR THE
DISTRICT OF COLUMBIA
555 Fourth Street, NW
Washington, DC 20530
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Date Filed	#	Docket Text
09/17/2019	<u>1</u>	COMPLAINT against U.S. DEPARTMENT OF STATE (Filing fee \$ 400 receipt number 0090-6381822) filed by PROTECT DEMOCRACY PROJECT, INC.. (Attachments: # <u>1</u> Exhibit Group Request, # <u>2</u> Exhibit Mortazavi Request, # <u>3</u> Exhibit Group Acknowledgment, # <u>4</u> Exhibit Mortazavi Acknowledgment, # <u>5</u> Civil Cover Sheet, # <u>6</u> Summons)(Abate, Michael) (Entered: 09/17/2019)
09/17/2019	<u>2</u>	LCvR 26.1 CERTIFICATE OF DISCLOSURE of Corporate Affiliations and Financial Interests by PROTECT DEMOCRACY PROJECT, INC. (Abate, Michael) (Entered: 09/17/2019)
09/19/2019		Case Assigned to Judge Randolph D. Moss. (zeg) (Entered: 09/19/2019)
09/19/2019	<u>3</u>	SUMMONS (1) Issued Electronically as to U.S. DEPARTMENT OF STATE. (Attachment: # <u>1</u> Notice and Consent)(zeg) (Entered: 09/19/2019)
09/19/2019	<u>4</u>	STANDING ORDER: The parties are hereby ORDERED to comply with the directives set forth in the attached Standing Order. See document for details. Signed by Judge Randolph D. Moss on 9/19/19. (lcrdm1,) (Entered: 09/19/2019)
10/15/2019	<u>5</u>	ENTERED IN ERROR. . . .REQUEST FOR SUMMONS TO ISSUE <i>with revised address</i> filed by NEGAR MORTAZAVI, PROTECT DEMOCRACY PROJECT, INC., ESFANDYAR BATMANGHELIDJ, MOHAMMAD ALI SHABANI, NARGES BAJOGHLI, TRITA PARSI.(Abate, Michael) Modified on 10/16/2019 (ztd). (Entered: 10/15/2019)
10/16/2019		NOTICE OF ERROR re <u>5</u> Request for Summons to Issue; emailed to mabate@kplouisville.com, cc'd 1 associated attorneys — The PDF file you docketed contained errors: 1. Please refile document, 2. The Executive Office is not listed as a party. If they are being served on behalf of the defendant (ztd,) (Entered: 10/16/2019)
11/01/2019	<u>6</u>	NOTICE of Appearance by Diana Viggiano Valdivia on behalf of U.S. DEPARTMENT OF STATE (Valdivia, Diana) (Entered: 11/01/2019)
11/01/2019	<u>7</u>	ANSWER to Complaint by U.S. DEPARTMENT OF STATE.(Valdivia, Diana) (Entered: 11/01/2019)
11/04/2019		MINUTE ORDER: It is ORDERED that, on or before November 25, 2019, the parties shall confer and file a joint status report addressing (1) any documents still to be produced pursuant to FOIA; (2) an anticipated schedule for processing and producing any such documents, and (3) any substantive areas of disagreement between the parties. It is FURTHER ORDERED that the parties shall appear for an Initial Scheduling Conference on December 2, 2019, at 10:30 a.m., in Courtroom 21. Signed by Judge Randolph D. Moss on 11/4/19. (lcrdm1) Modified on 11/4/2019 to edit hearing type (kt). (Entered: 11/04/2019)
11/25/2019	<u>8</u>	Joint STATUS REPORT by NARGES BAJOGHLI, ESFANDYAR BATMANGHELIDJ, NEGAR MORTAZAVI, TRITA PARSI, PROTECT DEMOCRACY PROJECT, INC., MOHAMMAD ALI SHABANI. (Abate, Michael) (Entered: 11/25/2019)
12/02/2019		Minute Entry for proceedings held before Judge Randolph D. Moss: Initial Scheduling Conference held on 12/2/2019. Defendant shall complete its searches by 12/13/2019; Defendant shall provide Plaintiff with potential responsive documents and pages by 12/18/2019, with first interim production by 1/17/2020; Defendant shall process no fewer than 600 pages of records each month. The parties shall file joint status reports on the third Friday of each month, commencing on 1/17/2020. (Court Reporter: Nancy Meyer.) (kt) (Entered: 12/02/2019)